

Attorney for Plaintiff

ROLANDO LEZAMA,

Plaintiff,

vs.

CLARK COUNTY, a political subdivision, and
municipality including its department, CLARK
COUNTY, DEPARTMENT OF AVIATION,

Defendant.

CASE NO. 2:17-cv-00086-JAD-VCF

STIPULATION AND REQUEST TO
EXTEND DISCOVERY AND OTHER
DEADLINES

(First Request)

COME NOW, Plaintiff, named above, by and through his counsel of record, MICHAEL P. BALABAN, ESQ., and Defendant, named above, by and through their counsel of record, WHITNEY J. SELERT, ESQ., pursuant to Local Rule 26-4, herein stipulate, agree and make joint application to extend the discovery cut-off and related dates for a period of ninety (90) days up to and including March 21, 2018. The present discovery cut-off date is December 21, 2017 and no calendar call date or trial date has been set.

1 This request is being made timely in accordance with LR 26-4 and the prior scheduling
2 order which provides that requests for further discovery extensions must be made no later than
3 twenty-one (21) days before the existing discovery cut-off date, or here by November 30, 2017.

4 This is the first request for an extension.

5 This stipulation is made and based upon the following factors.

6 Although counsels for both parties have been working diligently to complete the discovery
7 in this case, they still have to take depositions and the current discovery cut-off is only a little over
8 a month away. In addition there is a meet and confer scheduled for November 20, 2017 which
9 could result in a motion to compel further discovery responses if a resolution to the discovery
10 dispute is not agreed to.

11 To date the parties have both made their initial disclosures to the other side and both
12 Plaintiff and Defendant have propounded interrogatories and requests for production of documents
13 on the other side which have been responded to. Defendant has also propounded requests for
14 admissions on Plaintiff which have also been responded to. In addition Defendant has designated
15 an expert witness.

16 Finally Defendant has currently noticed Plaintiff's deposition for November 29, 2017 and
17 Plaintiff has requested dates to depose Defendant employees Sandy Jeantete, Christine Santiago,
18 James Chrisley, Lette Bonilla and Terrence McCarthy.

19 As set forth above, the attorneys for the parties have diligently worked to complete
20 discovery as expediently as possible and will continue to try to complete the remaining discovery
21 in as expedient a manner as possible.

22 Given the above, the parties request that the discovery period be extended as follows:

<u>Activity</u>	<u>Former Date</u>	<u>Requested Date</u>
Discovery Cut-Off Date	12/21/17	03/21/18
Dispositive Motions	01/22/18	04/23/18

1 Pretrial Order

02/21/18

05/23/18¹

2 In accordance with LR 26-4 the parties understand that any further requests for discovery
3 extensions must be made no later than twenty-one days before the new proposed discovery cut-off
4 date, ie. March 21, 2018, or no later than twenty-one days before any other deadline sought to be
5 extended.

6
7 LAW OFFICES OF MICHAEL P.
8 BALABAN

FISHER & PHILLIPS, LLP

9 /s/ Michael P. Balaban
10 Michael P. Balaban, Esq.
11 10726 Del Rudini St.
12 Las Vegas, NV 89141
13 Attorney for Plaintiff

/s/ Whitney J. Selert
Whitney J. Selert, Esq.
300 S. Fourth Street, Suite 1500
Las Vegas, NV 89101
Attorney for Defendant

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16 Dated: November 16, 2017

Dated: November 16, 2017

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19 IT IS SO ORDERED:



20 ~~UNITED STATES DISTRICT JUDGE~~
UNITED STATES MAGISTRATE JUDGE
Dated: November 16, 2017

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¹ Or 30 days after the decision on the last dispositive motion.